EXHIBIT 11

UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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GOOGLE LLC,
Petitioner,

v.

SINGULAR COMPUTING LLC,
Patent Owner.

_____

Case No. TBD
Patent No. 10,416,961

_____

DECLARATION OF RICHARD GOODIN

56.   Additionally, the claims expressly cover ***non-deterministic***

implementations, *i.e.*, execution units that produce different results for different

executions of the same operation on the same input. All of the challenged

independent claims recite "repeated execution" of the operation on "that same

input" and taking a "statistical mean" (which a POSA would have understood is an

average) of the output numerical values. *See* claims 1, 10, and 21. As I explain in

paragraphs 57-60 below, a POSA would have understood that the claims expressly

cover non-deterministic embodiments via the recited "statistical mean" provisions.

57.   The specification says some embodiments (*e.g.*, analog embodiments)

are non-deterministic. In discussing the prior art, the patent describes prior art

"[a]rray processors" that "use analog representations of numbers and analog

circuits to perform computations," and states that the "***SCAMP***" computer "is such

a machine." '961 patent, 3:63-65. The patent notes that "[t]hese

machines…introduce noise into their computations, so the computations are not

repeatable." '961 patent, 3:65-4:2. Later, when describing its embodiments, the

patent states that "[s]ome embodiments of the present invention may include

analog representations and processing methods." '961 patent, 14:23-24. The

patent states that "[s]uch methods, often called Analog methods, can be used to

perform LPHDR arithmetic in the broad range of architectures we have discussed,

of which SIMD is one example," and then states that "[a]n example of an ***analog***

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